

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
JESSICA DAVIDSON, ESQ.**

JESSICA DAVIDSON, ESQ., being of full age, certifies as follows:

1. I am a Partner at Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC. I make this Certification based on personal knowledge and in support of Defendants' Motion to Partially Exclude Opinions of Drs. Stephen Hecht and Ramin Najafi.

2. Attached hereto as Exhibit 1 is a true and accurate copy of the transcript of the deposition of Stephen Hecht, Ph.D., in MDL 2875, dated January 13, 2023. This document has been filed with redactions to the extent it contains information that has been designated as "PROTECTED INFORMATION" as defined in the Protective Order.

3. Attached hereto as Exhibit 2 is a true and accurate copy of the transcript of the deposition of Ramin (“Ron”) Najafi, Ph.D., in MDL 2875, dated January 18, 2023.

4. Attached hereto as Exhibit 3 is a true and accurate copy of the transcript of the deposition of Ramin (“Ron”) Najafi, Ph.D., in MDL 2875, dated February 3, 2022.

5. Attached hereto as Exhibit 4 is a true and accurate copy of the Report of Report of Ramin “Ron” Najafi, Ph.D., dated October 31, 2022, served in MDL 2875. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

6. Attached hereto as Exhibit 5 is a true and accurate copy of the Report of Report of Stephen Hecht, Ph.D., dated July 6, 2021, served in MDL 2875.

7. Attached hereto as Exhibit 6 is a true and accurate copy of the Report of Report of Stephen Hecht, Ph.D., dated October 31, 2022, served in MDL 2875.

8. Attached hereto as Exhibit 7 is a true and accurate copy of relevant excerpts from the Report of Report of Fengtian Xue, dated December 22, 2022, served in MDL 2875. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

9. Attached hereto as Exhibit 8 is a true and accurate copy of Peter Smith & Richard Loeppky, Nitrosative Cleavage of Tertiary Amines, J. Am. Chem. Soc. 89, 1147-1157 (1967).

10. Attached hereto as Exhibit 9 is a true and accurate copy of https://chem.libretexts.org/Ancillary_Materials/Demos_Techniques_and_Experiments/Chemical_Safety/Reagent_Specific_Hazards/Sodium_Azide.

11. Attached hereto as Exhibit 10 is a true and accurate copy of the transcript of the deposition of Ramin (“Ron”) Najafi, in MDL 2875, dated January 24, 2023.

12. Attached hereto as Exhibit 11 is a true and accurate copy of RN Loeppky et al, *Ester-mediated nitrosamine formation from nitrite and secondary or tertiary amines*. IARC Sci Publ. 1984; (57):353-63.

13. Attached hereto as Exhibit 12 is a true and accurate copy of relevant excerpts from PRINSTON0007579 (Deviation Investigation Report, dated 2018).

14. Attached hereto as Exhibit 13 is a true and accurate copy of relevant excerpts from *Purification of Laboratory Chemicals*, Armarego, WLF (4th Edition 1996; 6th Edition 2009).

15. Attached hereto as Exhibit 14 is a true and accurate copy of J. Muzart, *N,N-Dimethylformamide: much more than a solvent*, Tetrahedron 65, 8313-8323.

Respectfully submitted,

/s/ Jessica Davidson

Jessica Davidson (DC Bar No. 457021)
(Admitted to Practice in Maryland and the
District of Columbia; Not Admitted in New
York)

*Liaison Counsel for Manufacturer
Defendants*

SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP

One Manhattan West

New York, NY 10001

Telephone: (212) 735-3000

Facsimile: (917) 777-2588

jessica.davidson@skadden.com

*Attorneys for Zhejiang Huahai
Pharmaceutical Co., Ltd., Huahai
U.S., Inc., Princeton Pharmaceutical
Inc., and Solco Healthcare U.S., LLC*

Dated: March 13, 2023